

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

**In re: JCP PROPERTIES, LTD,
Debtor**

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§

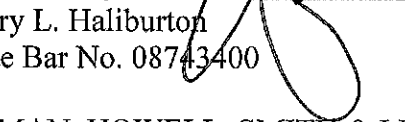
**Case No. 11-70827-RSS
Chapter 11**

**MOTION FOR ENTRY OF AGREED ORDER CONDITIONING AUTOMATIC STAY
[AND CO-DEBTOR STAY] REGARDING EXEMPT PROPERTY**

THIS IS A MOTION FOR ENTRY OF AN AGREED ORDER CONDITIONING THE AUTOMATIC STAY. IF YOU OBJECT TO THE GRANTING OF RELIEF, YOU SHOULD CONTACT THE MOVANT IMMEDIATELY TO TRY TO REACH AN AGREEMENT. IF YOU CANNOT REACH AN AGREEMENT, YOU MUST FILE A WRITTEN RESPONSE AND SEND A COPY TO MOVANT WITHIN 14 DAYS OF THE DATE THIS WAS MAILED TO YOU. IF NO TIMELY OPPOSITION IS FILED, THE COURT MAY GRANT THE RELIEF WITHOUT A HEARING.

1. Movant: Compass Bank.
2. Movant, directly or as agent for the holder, holds a security interest in Tract I: All of Lots 3, and 4, BONITA HOMES SUBDIVISION, an Addition to the City of Weslaco, Hidalgo County Texas, according to the map recorded in Volume 45, page 153, Map Records in the Office of the County Clerk of Hidalgo County, Texas, and Tract II: All of Lots 7, and 8, BONITA HOMES SUBDIVISION, an Addition to the City of Weslaco, Hidalgo County, Texas according to the map recorded in Volume 45, page 153, Map Records in the Office of the County Clerk of Hidalgo County, Texas.
3. The Debtor's exemptions ____ have X have not been allowed.
4. Type of collateral (e.g., Home, Manufactured Home, Car, Truck, Motorcycle): Real Property.
5. Debtor's scheduled value of property: \$414,448.00.
6. Movant's estimated value of property: \$414,448.00.
7. Total amount owed to movant: \$320,479.60.
8. Estimated equity (paragraph 6 minus paragraph 7): \$93,968.40.
9. Total pre and post-petition arrearages: \$34,251.18.
10. Total post-petition arrearages: \$30,756.22.
11. Amount of unpaid, past due property taxes, if applicable: N/A.
12. Expiration date on insurance policy, if applicable: N/A.
13. Movant and Debtor [and co-debtor, if applicable] have agreed to condition the automatic stay pursuant to the terms of the attached agreed order. Accordingly, the parties request entry of the agreed order.

Date: October 26, 2012.

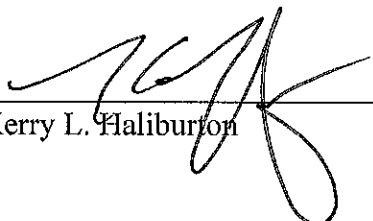


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ATTORNEYS FOR COMPASS BANK

Certificate of Service and Certificate of Compliance with BLR 4001

A copy of this motion was served on the persons shown on exhibit "1" at the addresses reflected on that exhibit on October 26, 2012 by prepaid United States first class mail. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.



Kerry L. Haliburton

EXHIBIT "1"

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